

## Exhibit 1

Letter from Abowitz to  
Harmon and McCalip,  
July 15, 2014

**ABOWITZ, TIMBERLAKE & DAHNKE, P.C. LAWYERS**

105 NORTH HUDSON, TENTH FLOOR  
POST OFFICE Box 1937  
OKLAHOMA CITY, OKLAHOMA 73101  
TELEPHONE: (405) 236-4645  
FACSIMILE: (405) 239-2843  
[www.abowitzlaw.com](http://www.abowitzlaw.com)

MURRAY E. ABOWITZ  
SARAH J. TIMBERLAKE  
GEORGE W. DAHNKE  
J. DEREK COWAN  
APRIL B. EBERLE

OF COUNSEL:  
WILLIAM C. McALISTER  
WILLIAM P. TUNELL, JR.

Writer's E-Mail Address  
[mea@abowitzlaw.com](mailto:mea@abowitzlaw.com)

July 15, 2014

**Via Email:**

Timothy S. Harmon  
Shawna L. McCalip  
HOLDEN & CARR  
15 East Fifth Street, Suite 3900  
First Place  
Tulsa, Oklahoma 74103

Re: ZHN, LLC v. Randy Miller, LLC, et al.  
U.S.D.C., Western District of Oklahoma  
Case No. CIV-12-1289-M  
Our File No. 2338-0002

Dear Counsel:

I'm following up on the conversation we had last week, in which we stayed the deposition discovery schedule. As I related, in that conversation, I had concern about discovery responses and wanted to ensure these responses were complete and accurate, before presenting Mr. Magid for his deposition. This letter addresses that subject and is written pursuant to LCvR 37.1 and 37 FRCivP.

As a general matter, a number of the responses to Requests for Production and answers to Interrogatories were coupled with an objection. With respect to those Interrogatories and Requests for Production, to which an answer has been given or documents have been produced, please confirm the answering defendant, has not withheld any documents, or information because of the objections posed. I refer specifically to, Interrogatories No.'s 5, 6, 7, 8 and 9, addressed to Lippard Auctioneers;

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Interrogatories No.'s 1 and 5, addressed to Troy Lippard; and Interrogatories No.'s 2, 3, 4 and 5, addressed to Angie Lippard.

We have a particular concern, as to whether the document identifying high bidders and runner up bidders by their respective bidder number as it existed at the close of the auction prior to revisions has been produced. We also have concerns about the existence of other documents that have not been produced. Please supplement your production regarding those documents or confirm they do not exist, such as the barcode scanner records, emails between Lippard and Miller before the auction, communications related to sale or offers to sell tracts after the Auction, and documents relating to the registration of each bidder. With respect to responses to Requests for Production directed to Lippard Auctioneers, particularly, Request for Production No. 1, appears to be a partial list of winning bids and backup bidders, which was identified in your February 3, 2014 Rule 26 Disclosures. We have the same concern with respect to the Response to Request for Production No. 2, which we raised earlier in this letter about whether, or not the information supplied regarding high bidder/runner up bidder and other bidders and bids on the subject properties are complete. Clerking Change Log produced, as Lippard0237 and Lippard0238, also appears to be incomplete.

We would request confirmation of the Response for Production No. 3, in that, no documents are being withheld in light of the defendant's objections. We request the same confirmation for Requests for Production No.'s 6, 7, 10, 13, 14, 15, 16, 20, 21, 22, 23, 24, 26, 31, 33, 34, 35, 37, 38, 39, 41, 42, 43, 44 and 45.

Request for Production No.'s 9, 17, 18, 19, 29, 32, 40 are the subject of objections, but no production has been made. Is the production being withheld based upon the objection? We request that whatever documents exist, be produced, or confirm that no such documents exist. With respect to response to Request for Production No. 9, an equipment sale on behalf of Miller was planned to be held after the Auction.

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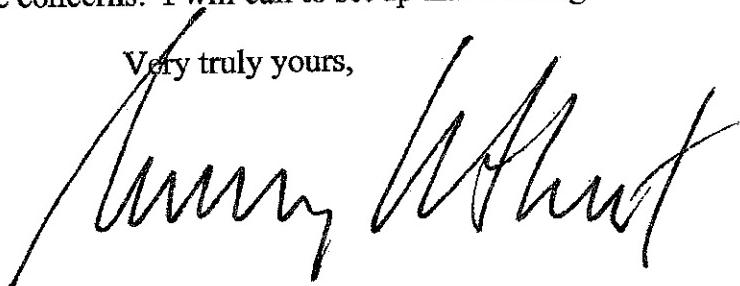
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Please confirm that no other sale on behalf of Miller took place or produce documents related to any such sale.

Jerry Whitney has responded to Interrogatories No.'s 3, 4 and 5, with objections we request confirmation that the responses are complete, notwithstanding, the objections.

We are available at a mutually convenient time to discuss these matters and to reach a resolution of these concerns. I will call to set up that meeting.

Very truly yours,



Murray E. Abowitz

MEA/sdk

cc: Clint A. Claypole  
Randy J. Long  
GWD  
Alex Magid